

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 05-2 E
	)	
KEITH ALLEN PROCTOR	)	

**MOTION TO CONTINUE SENTENCING HEARING**

AND NOW, comes the defendant, Keith Allen Proctor, by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and files the within Motion to Continue Sentencing Hearing and in support thereof sets forth as follows:

1. Mr. Proctor's sentencing hearing is currently set for Tuesday, June 13, 2006, at 1:30 p.m.
2. The government has filed numerous objections to the presentence report and has requested a large upward departure. The government's arguments require defense counsel to consult with multiple experts and gather documents before a proper response can be filed.
3. Accordingly, Mr. Proctor respectfully requests that the sentencing hearing be continued for at least 60 days.
4. Assistant United States Attorney Christian A. Trabold does not object to this motion.

WHEREFORE, the defendant, Keith Allen Proctor, respectfully requests that this Honorable Court continue the sentencing hearing in this case for at least 60 days.

Respectfully submitted,

/s/ Thomas W. Patton  
Thomas W. Patton  
Assistant Federal Public Defender  
PA I.D. No. 88653